

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ADAM HAGE INSURANCE AGENCY,)	
INC., individually and on behalf of all others)	
Similarly situated,)	
)	
Plaintiff,)	No. 1:19-cv-3386
)	
v.)	
)	
WORLD FINANCIAL GROUP, INC., a)	
Delaware corporation, and)	
TRANSAMERICA CORPORATION, a)	
Delaware corporation,)	
)	
Defendants.)	

NOTICE OF REMOVAL

Defendants WORLD FINANCIAL GROUP, INC. (“WFG”) and TRANSAMERICA CORPORATION (“Transamerica”), submit this Notice of Removal in accordance with 28 U.S.C. §1446 for the removal of this action from the Circuit Court of Cook County, Illinois, County Department, Chancery Division, to the United States District Court for the Northern District of Illinois, Eastern Division, pursuant to 28 U.S.C. §1441. In support of its Notice of Removal, Defendants WFG and Transamerica state as follows:

1. This civil action was filed on April 17, 2019 in the Circuit Court of Cook County, Illinois, County Department, Chancery Division, as Cause No. 2019 CH 04962.
2. The Summons and Complaint were first served on Defendants WFG and Transamerica on April 22, 2019.
3. This Notice of Removal is being filed within thirty (30) days after the date that Defendants WFG and Transamerica were first served with the Summons and Complaint setting forth Plaintiff’s claim for relief.

4. The action is a civil action over which this Court has original jurisdiction under 28 U.S.C. §1331, and Defendants WFG and Transamerica are entitled to remove this action to this Court pursuant to 28 U.S.C. §1441, in that Plaintiff's claim against Defendants WFG and Transamerica is brought under the Telephone Consumer Protection Act, 47 USC § 227, on the basis of alleged text message transmissions to cellular phones which Plaintiff claims to have been sent in violation of the Act.

5. In accordance with 28 U.S.C. §1446(a), Defendants WFG and Transamerica state that the following documents constitute all the process, pleadings and orders served upon them:

- A. Summons served on WFG;
- B. Summons served on Transamerica;
- C. Class Action Complaint and Demand for Jury Trial.

True and correct copies of the aforementioned documents are attached hereto and made a part hereof as Exhibits A, B and C, respectively.

6. A true and correct copy of this Notice of Removal shall be filed with the Clerk of the Circuit Court of Cook County, Illinois, County Department, Chancery Division, in accordance with 28 U.S.C. §1446(d).

DATED: May 20, 2019

Respectfully submitted,

**WORLD FINANCIAL GROUP, INC. and
TRANSAMERICA CORPORATION**

By: /s/ David J. Novotny
One of its Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2019, I electronically filed the foregoing Notice of Removal, with the Clerk of the U.S. District Court, Northern District of Illinois, Eastern Division, using the CM/ECF system. A true and correct copy was sent to the following attorneys via e-mail:

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